

**BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001**

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

**Complaint on Sunday  
and Holiday Collections**

**Docket No. C2001-1**

**DOUGLAS F. CARLSON  
MOTION FOR LEAVE TO AMEND COMPLAINT**

**March 26, 2001**

Order No. 1307 initiated a proceeding to hear the complaint that I filed on October 27, 2000, concerning collections on Sundays, holidays, Christmas Eve, and New Year's Eve.<sup>1</sup> The order notes that I have not made a specific allegation that service levels on holidays and on the day before some holidays are not adequate within the meaning of 39 U.S.C. § 3661(a). Order at 17. However, the order granted me an opportunity to modify my complaint to make this allegation if I am "going to enter evidence in support of an allegation that holiday and holiday eve service levels are not adequate." *Id.* I move for leave to amend my complaint as indicated in underlined text in paragraphs 20 and 34 in the amended pages I am filing separately.<sup>2</sup>

After the Commission issued its order, I located a letter dated June 5, 1998, from the plant manager of the Oakland Processing and Distribution Center informing me that the Oakland P&DC cancelled and processed approximately 250,000 letters on Memorial Day in 1998. The Postal Service has since eliminated service on Memorial Day, as the Oakland P&DC did not process outgoing mail on Memorial Day in 2000. This quantity of letters cancelled on Memorial Day in 1998 was substantial, and it suggests that customers needed

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<sup>1</sup> Order No. 1307 ("Order"), filed March 20, 2001.

<sup>2</sup> Douglas F. Carlson Notice of Filing of Amended Pages of Complaint, dated March 26, 2001.

outgoing mail service on Memorial Day in 1998. While this letter provides valuable insight into only one plant on one holiday, the volume data raise the issue of whether the Postal Service, as a consequence of eliminating holiday mail processing on a substantially nationwide basis, currently fails to provide customers with an adequate level of service. Volume data obtained through discovery for processing on past holidays will provide a useful insight into the adequacy of postal services on current holidays.

In addition, the Commission's order confirmed that the Postal Service's failure to provide adequate notice to customers of changes in collection and mail-processing schedules may "rise to a failure or denial to provide a particular service." Order at 16–17. Postal customers experience great difficulty in obtaining information about actual holiday service levels. Through discovery and, possibly, my own testimony, I intend to develop evidence describing the Postal Service's shortcomings in informing the public of holiday service levels.

Therefore, I move for leave to amend my complaint to allege that the current holiday service levels may not be adequate within the meaning of 39 U.S.C. § 3661(a).

I also move for leave to amend my complaint to allege that collection services on Christmas Eve and, possibly, New Year's Eve may not be adequate within the meaning of 39 U.S.C. § 3661(a). The Commission's order noted that the Postal Service's failure to provide adequate notice to customers of temporary changes in collection schedules may "rise to a failure or denial to provide a particular service." Order at 16–17. The allegations in my complaint at ¶¶ 25 and 26 discussed the inadequacy of the notice provided during service curtailments in 1999. Therefore, I already have effectively raised the issue of the adequacy of service levels on Christmas Eve and, possibly, New Year's Eve. My request for leave to amend my complaint to state a specific allegation is reasonable and does not constitute an unwarranted expansion of the scope of my complaint. Through discovery and, possibly, my own testimony, I intend to

develop evidence describing the Postal Service's shortcomings in informing the public of temporary changes in collection schedules on Christmas Eve and, possibly, New Year's Eve.

For the reasons explained herein, I move for leave to amend my complaint.

Respectfully submitted,



Dated: March 26, 2001

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DOUGLAS F. CARLSON

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon the required parties in accordance with section 12 of the *Rules of Practice*.



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DOUGLAS F. CARLSON

March 26, 2001  
Santa Cruz, California